

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
SARAH PALIN,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	No. 1:17-cv-04853-JSR
	:	
THE NEW YORK TIMES COMPANY and JAMES	:	
BENNET,	:	
	:	
Defendants.	:	
-----	X	

**NOTICE OF MOTION *IN LIMINE*
TO EXCLUDE EVIDENCE OF UNRELATED
CONTROVERSIES AND ASSOCIATED RELIEF**

PLEASE TAKE NOTICE that Defendants The New York Times Company (“The Times”) and James Bennet will file a motion requesting that the Court (1) exclude from evidence and preclude the Ms. Palin from asking witnesses questions about the conclusion of Mr. Bennet’s tenure at The Times, including the op-ed by Senator Tom Cotton which precipitated his departure, and (2) require Ms. Palin to inform defense counsel before asking a question or introducing an exhibit related to other controversies unrelated to the instant dispute so that a sidebar can be requested if necessary. Defendants have served their papers in support of this motion on March 31, 2025, and will file their papers by April 7, 2025, and Plaintiff’s answering papers are due on April 7, 2025. Pursuant to Rule 9 of the Court’s Individual Rules of Practice, *in limine* motions are normally resolved on the morning of the first day of trial.

Dated: New York, New York
March 31, 2025

Respectfully submitted,

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